

LUTHER HEIGHTS BIBLE CAMP (PWS #5070034) SOURCE WATER ASSESSMENT FINAL REPORT

April 15, 2003



State of Idaho Department of Environmental Quality

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Executive Summary

Under the Federal Safe Drinking Water Act Amendments of 1996, all states are required by the U.S. Environmental Protection Agency (EPA) to assess every source of public drinking water for its relative sensitivity to contaminants regulated by the Act. The Idaho Department of Environmental Quality (DEQ) is completing the assessments for all Idaho public drinking water systems.

The assessment for your particular drinking water source is based on a land use inventory within a 1,000-foot radius of your drinking water source, sensitivity factors associated with the source, and characteristics associated with either your aquifer or watershed in which you live.

The delineation process establishes the physical area around a drinking water source that will become the focal point of the assessment. The arbitrary-fixed radius method was used to delineate transient water systems (Idaho Source Water Assessment Plan, pg. 15 and E5-E6) by drawing a 1000-foot radius circle around the drinking water sources. This distance is the same for every transient drinking water source. It is impractical to develop more intensive delineations for these systems because of limited resources for protection and lack of jurisdiction over land use outside property boundaries.

This report, *Source Water Assessment for the Luther Heights Bible Camp: Public Water System (PWS) #5070034* describes the public drinking water system, the associated potential contaminant sources located within a 1,000-foot boundary around the drinking water source, and the susceptibility (risk) that may be associated with any associated potential contaminants. This assessment should be used as a planning tool, taken into account with local knowledge and concerns, to develop and implement appropriate protection measures for this system. **The results should not be used as an absolute measure of risk and is not intended to undermine the confidence in your water system.**

Final susceptibility scores for a well are derived from equally weighing system construction scores, hydrologic sensitivity scores, and potential contaminant/land use scores. Similarly, final susceptibility score for a spring are derived from heavily weighing potential contaminant/land use scores and adding them to the system construction score. Therefore, a low rating in one or two categories coupled with a higher rating in other categories results in a final rating of low, moderate, or high susceptibility. With the potential contaminants associated with most urban and heavily agricultural areas, the best score a drinking water source can get is moderate. Potential Contaminants/Land Uses are divided into four categories, inorganic contaminants (IOCs, e.g. nitrates, arsenic), volatile organic contaminants (VOCs, e.g. petroleum products), synthetic organic contaminants (SOCs, e.g. pesticides), and microbial contaminants (e.g. bacteria). As different drinking water sources can be subject to various contamination settings, separate scores are given for each type of contaminant.

The *Luther Heights Bible Camp* drinking water system consists of one ground water well and a developed spring that serve approximately 100 people through nine connections. The well rated highly susceptible to IOC's and microbial contaminants and moderately susceptible to VOC's and SOC's. The spring rated moderately susceptible to microbial contaminants and low susceptibility to IOC's, VOC's, and SOC's. The lack of a well log resulted in high ratings for well construction and hydrologic sensitivity. Similarly, due to lack of information, the spring rated high for spring construction. The well and the spring rated low for potential contaminant inventory/land use.

The initial computer generated contaminant source inventory conducted by DEQ did not identify any potential contaminant sources within the 1,000-foot boundary of either the well or the spring. However, the Geographic Information System (GIS) map shows that both delineations include an unimproved road that leads to Camp Luthy near the well and to Smoky Bear Lodge near the spring. Additionally, the Ground Water Under Direct Influence (GWUDI) field survey indicates that a septic system lies within 150 feet of the wellhead. All of these contaminant sources can contribute contaminants to the aquifer in the event of an accidental spill or release or a flood. The tables below list these contaminants. A copy of the susceptibility analysis worksheets for the well and for the spring for your system along with maps showing any potential contaminant sources is included with this summary.

Table 1. Luther Heights Bible Camp, Well #1, Potential Contaminant Inventory

Site #	Source Description ¹	Source of Information	Potential Contaminants ²
	Unimproved Road	GIS Map	IOC, VOC, SOC, Microbials
	Septic System	GWUDI	IOC, Microbials

² IOC = inorganic chemical, VOC = volatile organic chemical, SOC = synthetic organic chemical

Table 2. Luther Heights Bible Camp, Spring, Potential Contaminant Inventory

Site #	Source Description ¹	Source of Information	Potential Contaminants ²
	Unimproved Road	GIS Map	IOC, VOC, SOC, Microbials

² IOC = inorganic chemical, VOC = volatile organic chemical, SOC = synthetic organic chemical

Susceptibility Analysis

The susceptibility of each drinking water source to contamination was ranked as high, moderate, or low risk according to the following considerations: hydrologic characteristics for the well only, physical integrity of the drinking water source, land use characteristics, and potentially significant contaminant sources. The susceptibility rankings are specific to a particular potential contaminant or category of contaminants. Therefore, a high susceptibility rating relative to one potential contaminant does not mean that the water system is at the same risk for all other potential contaminants. The relative ranking that is derived for each drinking water source is a qualitative, screening-level step that, in many cases, uses generalized assumptions and best professional judgement. The following summaries describe the rationale for the susceptibility ranking.

Hydrologic Sensitivity

The hydrologic sensitivity of a well is dependent upon four factors: the surface soil composition, the material in the vadose zone (between the land surface and the water table), the depth to first ground water, and the presence of a 50-foot thick fine-grained zone (aquitar) above the producing zone of the well. Slowly draining soils such as silt and clay typically are more protective of ground water than coarse-grained soils such as sand and gravel. Similarly, fine-grained sediments in the subsurface and a water depth of more than 300 feet protect the ground water from contamination.

The hydrologic sensitivity was high for the Luther Heights Bible Camp well. The score was based upon moderate to well drained soil classes as defined by the National Resource Conservation Service (NRCS). Poor to moderately draining soils tend to impede the migration of contaminants to the aquifer. A well log was unavailable, limiting the information concerning the composition of the vadose zone, the depth to first ground water, and the presence of any fine-grained zones that could create an aquitar above the producing zone. When information is unavailable, a higher, more conservative score is given.

Well Construction

Well construction directly affects the ability of the well to protect the aquifer from contaminants. System construction scores are reduced when information shows that potential contaminants will have a more difficult time reaching the intake of the well. Lower scores imply a system is less vulnerable to contamination. For example, if the well casing and annular seal both extend into a low permeability unit, then the possibility of contamination is reduced and the system construction score goes down. If the highest production interval is more than 100 feet below the water table, then the system is considered to have better buffering capacity. If the wellhead and surface seal are maintained to standards and the well casing is vented, as outlined in sanitary surveys, then contamination down the well bore is less likely. If the well is protected from surface flooding and is outside the 100-year floodplain, then contamination from surface events is reduced.

System construction for the well was rated highly vulnerable to contamination. A well log was unavailable, limiting the information concerning the thickness, diameter, and depth of the casing, the placement of the annular seal, the location of the highest production zone of the well, and the location of the static water level. The 2000 sanitary survey indicates that the wellhead and surface seals are maintained to standards. However, the well is in a pit and the casing does not extend the required 12 inches above the floor surface to properly protect it from surface flooding. The well is located outside a 100-year floodplain.

The Idaho Department of Water Resources *Well Construction Standards Rules* (1993) require all Public Water Systems (PWSs) to follow DEQ standards. IDAPA 58.01.08.550 requires that PWSs follow the *Recommended Standards for Water Works* (1997) during construction. Some of the requirements include casing thickness, well tests, and depth and formation type that the surface seal must be installed into. Table 1 of the *Recommended Standards for Water Works* (1997) lists the required steel casing thickness for various diameter wells. Well tests are required at the design pumping rate for 24 hours or until stabilized drawdown has continued for at least six hours when pumping at 1.5 times the design pumping rate. Though the well may have met standards at the time of construction, current construction standards are stricter. In this case, there was insufficient information to determine if the well meets construction standards.

Spring Construction

Spring construction directly affects the ability of the intake to protect the aquifer from contaminants. The Idaho Administrative Code for Public Drinking Water Systems (IDAPA 58.01.08.04) states those springs, which supply water for a public water system, shall ensure that the following requirements are met:

- a. Springs shall be housed in a permanent structure and protected from contamination including the entry of surface water, animals, and dust;
- b. A sample tap shall be provided;
- c. A flow meter or other flow measuring device shall be provided; and
- d. The entire area within one hundred (100) feet of the spring shall be owned by the supplier of water or controlled by a long term lease, fenced to prevent trespass of livestock, and void of buildings, dwellings and sources of contamination. Surface water and drainage ditches shall be diverted from this area.

With regards to this report, spring construction was evaluated by answering two questions: 1. Is the intake structure of the spring located and constructed to Idaho Code; 2. Is the water collected in such a manner that it is not exposed to any surface related contaminants before it enters the distribution system?

The spring rated high for construction. The 2000 sanitary survey indicates that the water is collected from an underground source but that the pipe is broken approximately one-quarter mile from the spring box, potentially exposing the water to the atmosphere. It is unknown if the spring area is properly fenced and if the Luther Heights Bible Camp owns the land where the spring is located. It is also unknown if there is a berm or diversion above the spring area to divert surface water away from the collection area. The sanitary survey indicates that the intake structure is properly constructed and that there are locking, watertight hatches on the spring box. When information is unavailable, a higher, more conservative score is given.

Potential Contaminant Source and Land Use

The well rated low for IOC's (e.g., arsenic, nitrate), VOC's (e.g., petroleum products), SOC's (e.g., pesticides), and microbial contaminants (e.g., bacteria). The spring also rated low for IOC's, VOC's, SOC's, and microbial contaminants. No total coliform bacteria, VOC's, or SOC's have been detected in the system. The IOC nitrate was detected at levels below the maximum contaminant level (MCL) set by the EPA. The predominant undeveloped land surrounding the well and spring areas contributed to the land use scores.

Final Susceptibility Rating

An IOC detection above a drinking water standard MCL, any detection of a VOC or SOC, or a confirmed detection of total coliform bacteria or fecal coliform bacteria at the drinking water sourcehead will automatically give a high susceptibility rating to a drinking water source, despite the land use of the area, because a pathway for contamination already exists. Additionally, having potential contaminant sources within 50 feet of the wellhead and within 100 feet of a spring area will give an automatic high susceptibility rating. Having multiple potential contaminant sources within the 1000-foot radius of the drinking water source and much agricultural land contribute greatly to the overall ranking. In terms of total susceptibility, the well rated high for IOC's and microbial contaminants and moderate for VOC's and SOC's. The spring rated low for IOC's, VOC's, and SOC's and moderate for microbial contaminants. The high scores of hydrologic sensitivity for the well and system construction for the spring and the well combined with the low land use scores contributed to the overall susceptibility of the Luther Heights Bible Camp drinking water system.

Options for Drinking Water Protection

This assessment should be used as a basis for determining appropriate new protection measures or re-evaluating existing protection efforts. No matter what ranking a source receives, protection is always important. Whether the source is currently located in a "pristine" area or an area with numerous industrial and/or agricultural land uses, the way to ensure good water quality in the future is to act now to protect valuable water supply resources.

For Luther Heights Bible Camp, drinking water protection activities should focus on correcting any deficiencies outlined in the sanitary survey (an inspection conducted every five years with the purpose of determining the physical condition of a water system's components and its capacity). Partnerships with state and local agencies and industry groups should be established and are critical to success. You may want to establish a dialog with the relevant state and local agencies related to wellhead protection and protection of springs as a drinking water source. Drinking water protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term. Providing a well log and a construction plan for the spring to the state and local agencies may assist them in determining your drinking water protection needs.

Due to the time involved with the movement of ground water, drinking water protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term. A strong public education program should be a primary focus of any drinking water protection plan because the delineations show large areas of urban land use. There are multiple resources available to help communities implement protection programs, including the Drinking Water Academy of the EPA. For areas where transportation corridors transect the delineation, the Department of Transportation should be included in protection activities. Drinking water protection activities for agriculture should be coordinated with the Idaho State Department of Agriculture, the Soil Conservation Commission, the local Soil Conservation District, and the Natural Resources Conservation Service.

Assistance

Public water suppliers and others may call the following DEQ offices with questions about this assessment and to request assistance with developing and implementing a local protection plan. In addition, draft protection plans may be submitted to the DEQ office for preliminary review and comments.

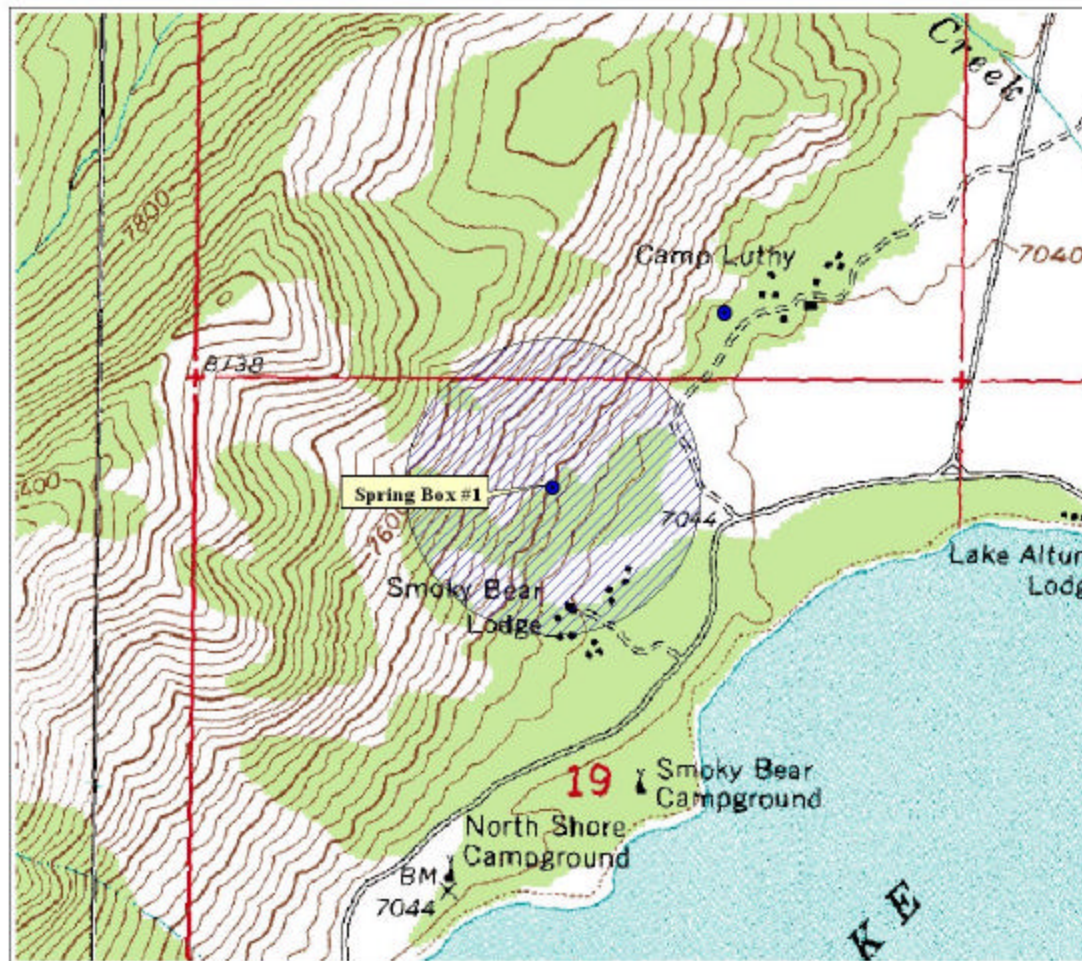
Twin Falls Regional DEQ Office (208) 736-2190

State DEQ Office (208) 373-0502

Website: <http://www.deq.state.id.us>

Water suppliers serving fewer than 10,000 persons may contact Melinda Harper (mlharper@idahoruralwater.com), Idaho Rural Water Association, at (208) 343-7001 for assistance with drinking water protection (formerly wellhead protection) strategies.

Luther Heights Bible Camp: Spring Box #1 **PWS Number: 5070034**



0 2000 4000 Feet

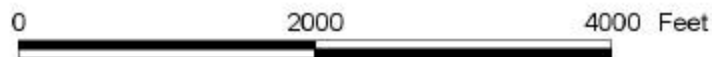
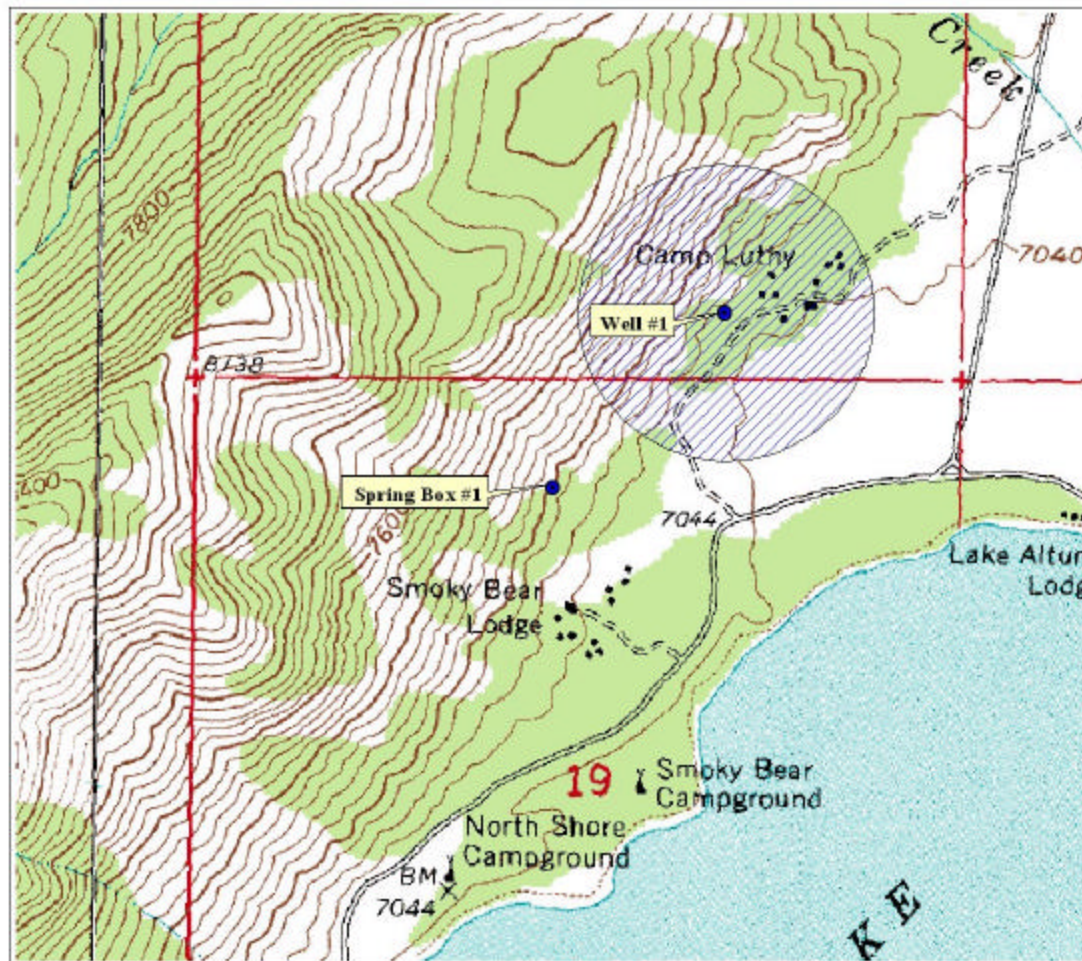


Legend

- Wellhead
- + Enhanced Inventory
- Toxic Release Inventory
- CERCLIS Site
- RICIS Site
- Business Mailing List
- ★ Dairy
- LUST Site
- UST Site
 - ▲ Closed
 - ▲ Open
- NPDES Site
- ⚡ Mine
- AST
- Recharge Point
- SARA Title III Site (EPCRA)
- Injection Well
- Group I Site
- Cyanide Site
- Boise VOCs
- Landfill
- Wastewater Land App. Site
- Transient Delineation

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Luther Heights Bible Camp: Well #1
PWS Number: 5070034



Legend

- Wellhead
 Enhanced Inventory
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POTENTIAL CONTAMINANT INVENTORY LIST OF ACRONYMS AND DEFINITIONS

AST (Aboveground Storage Tanks) – Sites with aboveground storage tanks.

Business Mailing List – This list contains potential contaminant sites identified through a yellow pages database search of standard industry codes (SIC).

CERCLIS – This includes sites considered for listing under the **Comprehensive Environmental Response Compensation and Liability Act (CERCLA)**. CERCLA, more commonly known as Superfund is designed to clean up hazardous waste sites that are on the national priority list (NPL).

Cyanide Site – DEQ permitted and known historical sites/facilities using cyanide.

Dairy – Sites included in the primary contaminant source inventory represent those facilities regulated by Idaho State Department of Agriculture (ISDA) and may range from a few head to several thousand head of milking cows.

Deep Injection Well – Injection wells regulated under the Idaho Department of Water Resources generally for the disposal of stormwater runoff or agricultural field drainage.

Enhanced Inventory – Enhanced inventory locations are potential contaminant source sites added by the water system. These can include new sites not captured during the primary contaminant inventory, or corrected locations for sites not properly located during the primary contaminant inventory. Enhanced inventory sites can also include miscellaneous sites added by the Idaho Department of Environmental Quality (IDEQ) during the primary contaminant inventory.

Floodplain – This is a coverage of the 100-year floodplains.

Group 1 Sites – These are sites that show elevated levels of contaminants and are not within the priority one areas.

Inorganic Priority Area – Priority one areas where greater than 25% of the wells/springs show constituents higher than primary standards or other health standards.

Landfill – Areas of open and closed municipal and non-municipal landfills.

LUST (Leaking Underground Storage Tank) – Potential contaminant source sites associated with leaking underground storage tanks as regulated under RCRA.

Mines and Quarries – Mines and quarries permitted through the Idaho Department of Lands.)

Nitrate Priority Area – Area where greater than 25% of wells/springs show nitrate values above 5 mg/l.

NPDES (National Pollutant Discharge Elimination System) – Sites with NPDES permits. The Clean Water Act requires that any discharge of a pollutant to waters of the United States from a point source must be authorized by an NPDES permit.

Organic Priority Areas – These are any areas where greater than 25% of wells/springs show levels greater than 1% of the primary standard or other health standards.

Recharge Point – This includes active, proposed, and possible recharge sites on the Snake River Plain.

RICRIS – Site regulated under **Resource Conservation Recovery Act (RCRA)**. RCRA is commonly associated with the cradle to grave management approach for generation, storage, and disposal of hazardous wastes.

SARA Tier II (Superfund Amendments and Reauthorization Act Tier II Facilities) – These sites store certain types and amounts of hazardous materials and must be identified under the Community Right to Know Act.

Toxic Release Inventory (TRI) – The toxic release inventory list was developed as part of the Emergency Planning and Community Right to Know (Community Right to Know) Act passed in 1986. The Community Right to Know Act requires the reporting of any release of a chemical found on the TRI list.

UST (Underground Storage Tank) – Potential contaminant source sites associated with underground storage tanks regulated as regulated under RCRA.

Wastewater Land Applications Sites – These are areas where the land application of municipal or industrial wastewater is permitted by IDEQ.

Wellheads – These are drinking water well locations regulated under the Safe Drinking Water Act. They are not treated as potential contaminant sources.

NOTE: Many of the potential contaminant sources were located using a geocoding program where mailing addresses are used to locate a facility. Field verification of potential contaminant sources is an important element of an enhanced inventory.

Where possible, a list of potential contaminant sites unable to be located with geocoding will be provided to water systems to determine if the potential contaminant sources are located within the source water assessment area.

References Cited

- Great Lakes-Upper Mississippi River Board of State and Provincial Public Health and Environmental Managers, 1997. “*Recommended Standards for Water Works.*”
- Idaho Department of Environmental Quality, 1997. *Design Standards for Public Drinking Water Systems*. IDAPA 58.01.08.550.01.
- Idaho Department of Environmental Quality, 1997. *Design Standards for Public Drinking Water Systems*. IDAPA 58.01.08.04.
- Idaho Department of Water Resources, 1993. *Administrative Rules of the Idaho Water Resource Board: Well Construction Standards Rules*. IDAPA 37.03.09.
- Idaho Division of Environmental Quality, 1999, Idaho Source Water Assessment Plan, October.
- South Central District Health Department, 2000. Sanitary Survey Inspection and Report for Luther Heights Bible Camp PWS #5070034.
- South Central District Health Department, 2000. Ground Water Under Direct Influence Field Survey for Luther Heights Bible Camp PWS #5070034.
- State Drinking Water Information System (SDWIS). IDEQ. 2003.

Susceptibility Analysis Formulas

For the Well:

The final scores for the susceptibility analysis were determined using the following formulas:

- 1) VOC/SOC/IOC Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.27)
- 2) Microbial Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.375)

Final Susceptibility Scoring:

- 0 - 5 Low Susceptibility
- 6 - 12 Moderate Susceptibility
- ≥ 13 High Susceptibility

For the Spring:

The final scores for the susceptibility analysis were determined using the following formulas:

- 3) VOC/SOC/IOC Final Score = System Construction + (Potential Contaminant/Land Use x 0.818)
- 4) Microbial Final Score = System Construction + (Potential Contaminant/Land Use x 1.125)

Final Susceptibility Scoring:

- 0 - 7 Low Susceptibility
- 8 - 15 Moderate Susceptibility
- ≥ 16 High Susceptibility

1. System Construction		SCORE			
Drill Date	UNKNOWN				
Driller Log Available	NO				
Sanitary Survey (if yes, indicate date of last survey)	YES	2000			
Well meets IDWR construction standards	NO	1			
Wellhead and surface seal maintained	YES	0			
Casing and annular seal extend to low permeability unit	NO	2			
Highest production 100 feet below static water level	NO	1			
Well located outside the 100 year flood plain	NO	1			
Total System Construction Score		5			
2. Hydrologic Sensitivity					
Soils are poorly to moderately drained	NO	2			
Vadose zone composed of gravel, fractured rock or unknown	YES	1			
Depth to first water > 300 feet	NO	1			
Aquitard present with > 50 feet cumulative thickness	NO	2			
Total Hydrologic Score		6			
3. Potential Contaminant / Land Use - ZONE 1A		IOC Score	VOC Score	SOC Score	Microbial Score
Land Use Zone 1A	RANGELAND, WOODLAND, BASALT	0	0	0	0
Farm chemical use high	NO	0	0	0	
IOC, VOC, SOC, or Microbial sources in Zone 1A	NO	NO	NO	NO	NO
Total Potential Contaminant Source/Land Use Score - Zone 1A		0	0	0	0
Potential Contaminant / Land Use - ZONE 1B					
Contaminant sources present (Number of Sources)	YES	2	1	1	2
(Score = # Sources X 2) 8 Points Maximum		4	2	2	4
Sources of Class II or III leacheable contaminants or	YES	2	1	1	
4 Points Maximum		2	1	1	
Zone 1B contains or intercepts a Group 1 Area	NO	0	0	0	0
Land use Zone 1B	Less Than 25% Agricultural Land	0	0	0	0
Total Potential Contaminant Source / Land Use Score - Zone 1B		6	3	3	4
Cumulative Potential Contaminant / Land Use Score		6	3	3	4
4. Final Susceptibility Source Score		13	12	12	13
5. Final Well Ranking		High	Moderate	Moderate	High

1. System Construction		SCORE			
Intake structure properly constructed	NO	1			
Is the water collected from an underground source					
Yes=spring developed to collect water from beneath the ground; lower score	NO	2			
No=water collected after it contacts the atmosphere or unknown; higher score					
Total System Construction Score		3			
2. Potential Contaminant / Land Use - ZONE 1A		IOC Score	VOC Score	SOC Score	Microbial Score
Land Use Zone 1A	RANGELAND, WOODLAND, BASALT	0	0	0	0
Farm chemical use high	NO	0	0	0	
IOC, VOC, SOC, or Microbial sources in Zone 1A	NO	NO	NO	NO	NO
Total Potential Contaminant Source/Land Use Score - Zone 1A		0	0	0	0
Potential Contaminant / Land Use - ZONE 1B					
Contaminant sources present (Number of Sources)	YES	1	1	1	1
(Score = # Sources X 2) 8 Points Maximum		2	2	2	2
Sources of Class II or III leacheable contaminants or	YES	1	1	1	
4 Points Maximum		1	1	1	
Zone 1B contains or intercepts a Group 1 Area	NO	0	0	0	0
Land use Zone 1B Greater Than 50% Non-Irrigated Agricultural		2	2	2	2
Total Potential Contaminant Source / Land Use Score - Zone 1B		5	5	5	4
Cumulative Potential Contaminant / Land Use Score		5	5	5	4
4. Final Susceptibility Source Score		7	7	7	8
5. Final Well Ranking		Low	Low	Low	Moderate